

**Before the
FEDERAL COMMUNICATIONS PETITION
Washington, D.C. 20554**

In the Matter of)	
)	
Communications Assistance for Law)	CC Docket No. 97-213
Enforcement Act)	
)	
Sprint PCS Section 107(c) Petition for)	Sprint Spectrum L.P.
a 60-Day Extension of Time of the)	TRS 811754
"Core J-Standard" Capabilities)	PhillieCo, L.P.
		TRS 811754
		SprintCom, Inc.
		TRS 818194
		American PCS Communications, LLC
		TRS 811156
		Cox Communications PCS, L.P.
		TRS 812437
		Brookings Municipal Utilities
		TRS 806727
		Central Wireless Partnership
		TRS 815248
To: Wireless Telecommunications Bureau		Gulf Coast Wireless LP
		TRS 815220

**SPRINT PCS PETITION FOR AN ADDITIONAL 45-DAY EXTENSION OF TIME
RELATIVE TO THE "CORE J-STANDARD" CAPABILITIES**

Sprint Spectrum L.P., on behalf of itself and the other companies providing commercial mobile radio services under the Sprint PCS brand (collectively, "Sprint PCS"),¹ seeks an additional 45-day extension of time, to January 15, 2002, in which to submit an approved Flexible

¹ Sprint PCS affiliates include Airgate PCS, Inc.; Alamosa PCS; Brookings Municipal Utilities d/b/a Swiftel Communications; Enterprise Communications; Georgia PCS; Gulf Coast Wireless LP; Horizon PCS; iPCS, Inc.; Independent Wireless One; Northern PCS; Shentel; UbiquiTel; and Via Wireless. Certain of these affiliates hold their own PCS licenses in certain areas. Many of the affiliates do not have their own TRS number.

Deployment Plan concerning the "core" capabilities set forth in J-STD-025 relative to circuit-switched networks.²

The Commission has "urged each carrier seeking an extension of the . . . CALEA deadline to participate in the [FBI's] Flexible Deployment Program before submitting to us a section 107(c) petition for extension of time to comply."³ The Commission has explained:

[A] carrier's participation in the FBI's Flexible Deployment Program enables the Commission to satisfy its statutory obligation to consult with the FBI, and assists the Commission in establishing the length of the petition carrier's extension based upon reasonable achievability.⁴

Sprint PCS has been working with the FBI's CALEA Implementation Section ("CIS") to develop an approved Flexible Deployment Plan. The parties were unable to complete the work by the September 30, 2001 deadline, so Sprint PCS requested a 60-day extension of this deadline.⁵ Sprint PCS and CIS have made substantial progress over the past two months, and Sprint PCS believes that it has now submitted all the information that CIS has requested in the format that CIS has specified. In addition, the parties have tentatively agreed to CALEA conversion dates for Sprint PCS' mobile switching centers and other network elements.

Nevertheless, Sprint PCS is in the process of clarifying certain terminology and providing some finer granularity of detail so CIS understands completely Sprint PCS' submissions. CIS thereafter needs additional time to process the completed package for approval. Because of the

² Sprint PCS has made two CALEA filings relative to its packet data networks. See Sprint PCS Petition for Declaratory Ruling Concerning Packet-Mode Networks Used in the Provision of Information Services, Docket No. 97-213 (Sept. 10, 2001); Sprint PCS Petition for an Extension of Time Concerning Its Packet-Mode Networks and Request for Expedited Ruling on Its Pending Declaratory Ruling Petition, Docket No. 97-213 (Nov. 19, 2001). [*confirm accuracy of second caption*]

³ *CALEA Punch List Extension Order*, Docket No. 97-213, FCC 01-265, at ¶ 10 (Sept. 21, 2001).

⁴ *CALEA Section 103 Compliance and Section 107(c) Petitions*, Docket No. 97-213, FCC 00-154, 15 FCC Rcd 7482 ¶ 6 (April 25, 2000).

press of business that CIS and Sprint PCS are facing during this time period and because of the upcoming holidays, Sprint PCS requests that the Commission extend to January 15, 2001 the date by which it may submit an approved Flexible Deployment Plan. Importantly, as Sprint PCS stated in its September 28, 2001 petition, grant of this brief extension will not delay Sprint PCS' installation of additional CALEA capabilities in the future and will have no effect on Sprint PCS' ability to assist law enforcement agencies in the conduct of their lawful electronic surveillance.

Questions concerning this matter should be directed to Joe Assenzo (contact information listed below) or to Dawn Dohrmann of the CALEA Implementation Section. Ms. Dohrmann can be reached at 703-814-4700.

In conclusion, Sprint PCS respectfully requests a 45-day extension, until January 15, 2002, in which to submit a Flexible Deployment Plan relative to the "core" capabilities set forth in J-STD-025.

⁵ See Sprint PCS, Petition for a Sixty-Day Extension of Time Relative to the "Core J-Standard" Capabilities, Docket No. 97-213 (Sept. 28, 2001).

Respectfully submitted,

SPRINT SPECTRUM L.P., d/b/a Sprint PCS

A handwritten signature in cursive script, reading "Luisa Lancetti by Kari Gray".

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November 30, 2001

CERTIFICATE OF SERVICE

I, Joseph R. Assenzo, hereby certify that on this 30th day of November 2001, a copy of the Sprint PCS Petition for an Additional 45-day Extension of Time Relative to the Core J-Standard Capabilities was served upon the following persons:

CALEA Implementation Section (one copy by U.S. mail)
14800 Conference Center Drive Suite 300
Chantilly, Virginia 20151-0450

Secretary, Federal Communications Commission (an original and two copies by U.S. mail)
ATTN: CALEA 107(c)
445 12th Street, S.W.
Washington, DC 20554

/s/ Joseph R. Assenzo

Joseph R. Assenzo